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Attorneys for the Plaintiffs' Executive Committee appointed by the Superior Court of the State of California, in and for the County of Alameda, in Case No. RG16843631 and related cases.

THE UNITED STATES BANKRUPTCY COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:) Case Nos. 19-30088 (DM)

PG&E CORPORATION,) Chapter 11

-and-

In re:

PACIFIC GAS AND ELECTRIC
COMPANY.

Debtors

- Affects PG&E Corporation
 - Affects Pacific Gas and Electric Company
 - Affects both Debtors

**JOINDER IN THE OBJECTIONS TO
MOTION OF DEBTORS PURSUANT TO
11 USC §§ 105(a), 363(b) AND 503(c)
FOR ENTRY OF ORDER (I) APPROVING
DEBTORS' INCENTIVE PROGRAM FOR
CERTAIN KEY EMPLOYEES AND (II)
GRANTING RELATED RELIEF FILED
BY:**

**1) THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS; AND**

**2) THE UNITED STATES TRUSTEE;
AND**

3) TURN THE UTILITY REFORM

DATE: July 24, 2019
TIME: 9:30 A.M.
PLACE: Courtroom 17
450 Golden Gate Avenue,
16th Fl.
San Francisco, California
JUDGE: Hon. Dennis Montali

* All papers shall be filed in the lead case,
No. 19-30088(DM)

JUDGE: Hon. Dennis Molinari
RELATED DOCKET NOS: 2664, 3029,
3030, and 3035

1 party in interest in the above-referenced Chapter 11 case, by and through its attorneys of
2 record, joins in, and supports the Opposition of the Official Committee of Tort Claimants to
3 Motion of Debtors Pursuant to 11 USC §§ 105(a), 363(b) and 503(c) for Entry of Order (I)
4 Approving Debtors' Incentive Program for Certain Key Employees and (II) Granting Related
5 Relief (Docket No. 3030). The Ghost Ship Warehouse Plaintiffs' Executive Committee
6 reserves the right to join in any supplemental objection(s) filed by the Official Committee of
7 Tort Claimants.

8 In addition, the Ghost Ship Warehouse Plaintiffs' Executive Committee joins in, and
9 supports the United States Trustee's Objection to Motion of Debtors For Entry of An Order
10 Approving Key Employee Incentive Plan (Docket No. 3029). The Ghost Ship Warehouse
11 Plaintiffs' Executive Committee reserves the right to join in any supplemental objection(s)
12 filed by the United States Trustee.

13 In addition, the Ghost Ship Warehouse Plaintiffs' Executive Committee joins in, and
14 supports the TURN, the Utility Reform Network's (hereinafter referred to as "TURN")
15 Opposition to Motion of Debtors Pursuant to 11 USC §§ 105(a), 363(b) and 503(c) for
16 Entry of Order (I) Approving Debtors' Incentive Program for Certain Key Employees and (II)
17 Granting Related Relief (Docket No. 3035). The Ghost Ship Warehouse Plaintiffs'
18 Executive Committee reserves the right to join in any supplemental objection(s) filed by the
19 TURN.
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21 The Ghost Ship Warehouse Plaintiffs' Executive Committee does hereby reserve
22 the right to join in and support any additional opposition(s) filed by creditors and other
23 parties in interest to the Motion of Debtors Pursuant to 11 USC §§ 105(a), 363(b) and
24 503(c) for Entry of Order (I) Approving Debtors' Incentive Program for Certain Key
25 Employees and (II) Granting Related Relief (hereinafter referred to as the "Motion for Entry
26 of Order to Approve Key Employees Incentive Plan") (Docket No. 2664).

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1 Based upon the instant Joinder and the arguments to be presented during the
2 hearing on July 24, 2019, the Ghost Ship Warehouse Plaintiffs' Executive Committee
3 respectfully requests that the Motion for Entry of Order to Approve Key Employees
4 Incentive Plan, be denied in its entirety.

6 || Dated: July 18, 2019

Respectfully submitted,

PINO & ASSOCIATES

By:

Estela O. Pino, Attorneys for the Ghost Ship
Warehouse Plaintiffs' Executive Committee